

ELECTRONICALLY FILED
11/13/2017 9:34 AM
2017-L-011496
CALENDAR: Z
PAGE 1 of 3
CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
LAW DIVISION
CLERK DOROTHY BROWN

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION

FRANCES KAY MILLS,

Plaintiff,

vs.

COSTCO WHOLESALE CORP., a Washington
corporation,

Defendant.

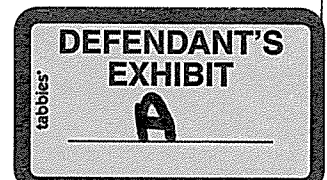
No. : _____

Cal.: _____

COMPLAINT AT LAW

NOW COMES Plaintiff, FRANCES KAY MILLS, by and through her attorney, Leonard S. Becker, Attorney at Law, complaining of Defendant, COSTCO WHOLESALE CORP., a Washington corporation, and states as follows:

1. That at the time of said occurrence hereinafter complained of and prior, Defendant, Costco Wholesale Corp., was and is a Washington corporation doing business in Illinois.
2. That on and prior to February 20, 2016, Defendant owned, rented, maintained, possessed, managed, controlled and/or inspected property located at 7311 N. Melvina, Village of Niles, County of Cook, State of Illinois at which it operated one of its wholesale stores (hereinafter the "Store").
3. That on and prior to February 20, 2016, there was a women's bathroom inside the Store located near the Store's front entrance and lawfully used by patrons of the Store.
4. That on February 20, 2016 at approximately 11:00 am at the place aforesaid, Plaintiff, a patron of the Store, was lawfully upon said premises and was intending to enter the aforesaid women's bathroom.



5. At all times relevant, Plaintiff was in the exercise of due care and caution for her own safety.

6. That it then and there became, and was, the duty of the Defendant by and through its employees and agents to exercise reasonable care and caution in the ownership, possession, control, maintenance, repair and upkeep of the floor outside the entrance to aforesaid women's bathroom, particularly at said place, so as to avoid causing injury to the Plaintiff and other persons lawfully walking on said floor.

7. As a direct and proximate result of the negligence of Defendant as hereinafter specified, Plaintiff was caused to slip, stumble, trip and violently fall on the floor outside the entrance to the Store's women's bathroom due to the dangerous condition of said floor, to wit; said floor was unreasonably wet and slippery.

8. That by disregarding its duty in the premises, Defendant was then and there guilty of one or more of the following negligent acts or omissions, to wit:

a. Carelessly and negligently failed to maintain said floor at said place in a reasonably safe condition for use by patrons;

b. Carelessly and negligently failed to warn the Plaintiff and other patrons approaching the women's bathroom of the dangerous conditions existing thereon, although it knew, or in exercise of ordinary care should have known or had notice of said condition and the danger thereon;

c. Carelessly and negligently failed to provide adequate lighting in said structure to allow for patrons such as Plaintiff to observe and recognize the danger associated with the wet and slippery floor; and

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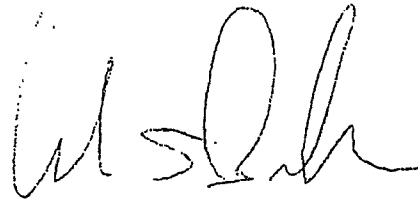
d. Otherwise carelessly and negligently maintained and controlled said floor so as to cause injury to the Plaintiff.

9. That as a direct and proximate result of one or more of the above set forth wrongful acts or omissions on the part of Defendant, Plaintiff was injured and suffered permanent bodily injuries, internal and external, internal derangements, severe bruises and contusions, incurred severe pain and suffering, suffered a severe shock to her nervous system, incurred medical expenses and loss of income, and was otherwise permanently injured.

WHEREFORE, Plaintiff, FRANCES KAY MILLS, prays for judgment against Defendant, COSTCO WHOLESALE CORP., a Washington corporation, in a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus costs.

RULE 222 AFFIDAVIT

The damages sought in this complaint are in excess of \$50,000.00.



Leonard S. Becker

Leonard S. Becker
Attorney for Plaintiff
311 N. Aberdeen
Suite 200D
Chicago, IL 60607
(312) 492-7700
lenbecker@lsblaw.net
Atty. No. 30278

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Summons - Alias Summons

(12/31/15) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

FRANCES KAY MILLS

v.

COSTCO WHOLESALE CORP.

No. 2017-L-011496

Defendant Address:

COSTCO WHOLESALE CORP.

R/A CT CORPORATION SYSTEM

208 SOUTH LASALLE ST.

218

CHICAGO, IL 60604

☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

☐ District 2 - Skokie

5600 Old Orchard Rd.
Skokie, IL 60077

☐ District 3 - Rolling Meadows

2121 Euclid 1500
Rolling Meadows, IL 60008

☐ District 4 - Maywood

Maybrook Ave.
Maywood, IL 60153

☐ District 5 - Bridgeview

10220 S. 76th Ave.
Bridgeview, IL 60455

☐ District 6 - Markham

16501 S. Kedzie Pkwy.
Markham, IL 60428

☐ Richard J. Daley Center

50 W. Washington, LL-01
Chicago, IL 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

☒ Atty. No.: 30278

Name: BECKER LEONARD S

Atty. for: FRANCES KAY MILLS

Address: 311N ABERDEEN#200D

City/State/Zip Code: CHICAGO, IL 60607

Telephone: (312) 492-7700

Primary Email Address: lenbecker@lsblaw.net

Secondary Email Address(es):

shaunaflaming@lsblaw.net

Witness:

Monday, 13 November 2017

/s/ DOROTHY BROWN

DOROTHY BROWN, Clerk of Court



Date of Service:

(To be inserted by officer on copy left with Defendant or other person)

**Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

DIE DATE
12/08/2017

SERVICE INF
RM 801 R A C

ATTACHED



DOC TYPE: LAW
CASE NUMBER: 17L011496
DEFENDANT
COSTCO WHOLESALE CORP
208 S LASALLE ST
CHICAGO, IL 60604
214

Summons - Alias Summons

(12/31/15) CCG N001

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FRANCES KAY MILLS

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COSTCO WHOLESALE CORP.

No. 2017-L-011496

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- | | | |
|--|--|--|
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| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
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Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
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shauna.fleming@lsblaw.net

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CHICAGO IL 60604
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DIE DATE
12/06/2017

SERVICE INF
RM 801 RAC

ATTACHED